

c) Remarks

The claims are 1, 3-8 and 12 with claim 1 the sole independent claim. Claim 1 has been amended to better define the intended invention. Reconsideration of the claims is requested.

Claim 1 has been amended to clarify that drying is done under hot air or infrared radiation conditions to enhance anchoring of the conductive layer without compromising the substrate since only moderate drying conditions are employed. Support for the amendment is found, *inter alia*, on page 9, lines 5-8 and 9-16.

Claims 1,3 and 5 were rejected as anticipated by Fiedler '387. Claims 4, 6, 8, and 12 were rejected as obvious over Fiedler '387 in view of the APA. The grounds of rejection are respectfully traversed.

Fiedler teaches drying is conducted by laser activated chemical metallization. In Col. 5, lines 54-59 it is taught that "targeted irradiation with focused light at appropriate places for metal deposition" is conducted. In Col. 6, lines 40-43 is is said use of a laser beam....allows metallization to be carried out both in and under process layers. In Col. 7, line 64 to Col. 8, line 6 it is said that the substrate is activated by chemical or electrochemical metallization. In Col. 8, lines 56-59 it is noted that the substrate is available, after drying, for conventional chemical metallization as with NiB.. See also Col. 9, lines 13-14. Accordingly a metal conductive layer is anchored by chemical metallization, not by mere drying.

Chemical metallization is quite limiting in that only a small number of substrates can be metallized due to resistance to etching; electroless depositions are inherently unstable and demand precise control; cost of chemicals, especially catalyst, is high; hazardous chemicals are

needed and usually many rinsing steps are required. The substrate can also be adversely effected by the rigors of chemical metallization.

The present claimed invention is distinguished from Fiedler because the metal particles are anchored by drying to remove the organic substance and the liquid medium and to form the conductive layer. In Fiedler the deposited metal crystal nuclei are formed into a electrically conductive layer on a substrate by laser activated chemical metallization. The deposited metal in Fiedler merely is said to form a deposit which covers the surface. Col. 5, lines 19-27. However, this deposit is not the conductive layer disclosed by Fiedler. Fiedler does not teach that colloid particles are sufficiently anchored for use as an electrically conductive layer. Instead, Fiedler requires that the deposited particles must be joined together as a plurality of individual layers by laser induced chemical metallization. Col. 5, lines 19-26 and 50-61.

The present invention provides more than a simple metal deposition on a surface as in Fiedler.

Instead, as shown in instant Figs. 2, 3, 5, and 6 a medium penetrates the porous adsorption layer and, upon drying, the colloidal particles are deposited on and under the substrate surface in its pores to anchor the particles and cover the surface.

The amendment should be entered, the claims should be allowed and the case passed to issue.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

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